

1
2
3
4
5
6 IN THE UNITED STATES DISTRICT COURT
7
8 FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

9 ABRAHAM GHORBANIAN, D.D.S.

10 Plaintiff,

11 vs.

12 GUARDIAN LIFE INSURANCE
13 COMPANY OF AMERICA, BERKSHIRE
14 LIFE INSURANCE COMPANY OF
15 AMERICA and DOES 1 THROUGH 10,

16 Defendants.

Case No. 2:14-CV-01396-RSM

**ORDER ON JOINT STIPULATION RE
COMPLETING THE DEPOSITION OF
THIRD PARTY MOSHEN
HAGHIGHATPOURR, D.D.S.,
FOLLOWING THE DISCOVERY CUT-
OFF**

17 The Parties to this matter, plaintiff Abraham Ghorbanian (“plaintiff”) and defendants
18 Berkshire Life Insurance Company of America and The Guardian Life Insurance Company
19 of America (“defendants”) (collectively “the Parties”), hereby stipulate as follows: Pursuant
20 to a subpoena served by defendants on Dr. Haghighatpourr, which did not include a request
21 for production of documents (“the subpoena”), Dr. Haghighatpourr’s deposition was taken
22 on March 23, 2017, in the Central District of California and adjourned. Through counsel, the
23 Parties stipulate that the deposition of Dr. Haghighatpourr can be re-set after the March 30,
24 2017 discovery cut-off in this matter.

25 In addition, the parties further stipulate that the court extend the current discovery
26 motion cut-off date of March 24, 2017, solely to permit the determination of Plaintiff’s

27 JOINT STIPULATION TO EXTEND DISCOVERY CUT-
28 OFF FOR THE PURPOSE OF COMPLETING THE
DEPOSITION OF DR. MOSHEN HAGHIGHATPOURR

Page 1

Case No.: 2:14-CV-01396-RSM

Donahue & Horrow, LLP
1960 E. Grand Ave.
Suite 1215
El Segundo, CA 90245
T: (310) 322-0300
F: (310) 322-0302

1 motion to compel the deposition testimony of Dr. Moshen Haghighatpourr and that this
2 stipulation does not and will not affect any dates pending before this court.

3
4 By: S/Michael B. Horrow
Michael B. Horrow

5
6 Michael B. Horrow, Admitted Pro Hac Vice
Nichole D. Podgurski, Admitted Pro Hac Vice
7 DONAHUE & HORROW, LLP
1960 E. Grand Ave., Suite 1215
8 El Segundo, California 90245
Telephone: (310) 322-0300
9 Facsimile: (310) 322-0302
Email: mhorrow@donahuehorrow.com
10 Email: npodgurski@donahuehorrow.com

11 Kenneth R. Friedman
12 FRIEDMAN RUBIN (BREMERTON)
1126 HIGHLAND A VENUE
13 BREMERTON, WA 98337
14 Telephone: 360-782-4300
Fax: 360-782-4358
15 Email: kfriedman@friedmanrubin.com

16 Attorneys for Plaintiff,
17 ABRAHAM GHOBANIAN, D.D.S.

18
19 By: /S/ Sean P. Nalty
Sean P. Nalty

20
21 Sean P. Nalty, Pro Hac Vice
OGLETREE, DEAKINS, NASH, SMOAK &
22 STEWART, P.C.
Steuart Tower, Suite 1300 One Market Plaza
23 San Francisco, CA 94105
24 Telephone: (415) 442-4810
Facsimile: (415) 442-4870
25 Email: sean.nalty@ogletreedeakins.com

26 Elizabeth S. Tipping, Pro Hac Vice (TN Bar 023066)

Email: etipping@nealharwell.com
James F. Sanders, Pro Hac Vice
Email: jsanders@nealharwell.com

Alfred E. Donohue (WSBA No. 98164)
WILSON SMITH COCHRAN DICKERSON
901 Fifth Avenue, Suite 1700
Seattle, WA 98165-2050
Telephone: (206) 623-4100
Facsimile: (206) 62309273
Email: donohue@wscd.com

Attorneys for Defendants THE BERKSHIRE LIFE
INSURANCE COMPANY OF AMERICA and
BERKSHIRE LIFE INSURANCE COMPANY OF
AMERICA

1
2
3 **ORDER UPON STIPULATION**

4 IT IS SO ORDERED.
5
6
7

8 Dated this 17th day of April, 2017
9

10
11 

12 RICARDO S. MARTINEZ
13 UNITED STATES DISTRICT JUDGE
14
15
16
17
18
19
20
21
22
23
24
25
26